

STATE OF MAINE

Department of Environmental Protection

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JOHN R. McKERNAN, JR.

DEAN C. MARRIOTT COMMISSIONER

November 5, 1992

Ms. Nancy Smith
USEPA, Waste Management
HSS-CAN 1, JFK Federal Building
Boston, MA 02203



SDMS DocID

582508

Re: Draft Site Inspection Report, Burt Company, Portland Maine

Dear Ms. Smith:

The Department has reviewed the above subject report and has the following comments:

- 1. Page 6, paragraph 2: The material contaminated with dye and lead which the MEDEP removed had not been burned, as implied in this paragraph.
- 2. Page 7 and page 19: Sherman Kendall is John Kendall's wife and should be addressed as Ms., not Mr..
- 3. Page 7, paragraph 3, last sentence. This sentence regarding the Burt Company's discharge license and RCRA status needs clarification.
- 4. Page 7, and page 19: On-site analyses indicated the presence of Barium compounds. These were not identified as Barium Sulfate. Solubility information regarding the barium compounds presented during hearings before the Board of Environmental Protection in the spring of 1991 suggests that the barium compounds were not barium sulfate. Therefore references to barium sulfate should be changed to the more generic barium compounds. This will provide consistency with the manner in which other metal compounds are reported at the site.
- 5. Page 9. Chipco International, Inc. has not been deleted by the Department from the list of Potential Responsible Parties at this site.
- 6. Page 9. It should be noted that an OVA is a general screening instrument that cannot distinguish between naturally occurring organic vapors and anthropogenic vapors.

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7. Page 11, paragraph 3, first sentence. The bags of lead and dye that the MEDEP sampled are better described as "spilled" rather than "opened".

If you have any additional questions, do not hesitate to contact me at 287-2651.

Sincerely,

David Wright,

Environmental Specialist

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Division of Site Investigation and Remediation Bureau Hazardous Materials and Solid Waste Control

pc Denise Messier Rebecca Hewett

BurtSI.doc/DW

It is **crucial** to determine whether there is, in fact, a surface water pathway for (from) this site. Can you clarify why the Portland Water Dept. claims there is no surface water runoff from the site which isn't captured in the sewer system? Where are the nearest sewers? Would overland flow be diverted to the sewers rather than to the surface waters onsite? What happened during fire-fighting onsite with regard to channeling of overland flow? If the wetlands are, in fact, contaminated as a result of a release from this site, is this definitive evidence of a surface water pathway?

Page 15, Do the substances detected in soils and sediments onsite account for the high OVA readings noted onsite?

Please revise the draft SI report to address these comments.